

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District Of Texas

FILED

## UNITED STATES DISTRICT COURT

APR 12 2019

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Raymond Allen PIERCY

Case No.

M-19-0825-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 11, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

21 USC 841 (a)(1)

## Offense Description

Knowingly and Intentionally Possess with Intent to Distribute a Controlled Substance, that is Approximately 7.85 Kilograms of Heroin, a Schedule I Controlled Substance Under the Controlled Substances Act

This criminal complaint is based on these facts:

See Attachment

☒ Continued on the attached sheet.

Complainant's signature

Special Agent Ashley Brazelton, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/12/2019City and state: McAllen, Texas

Judge's signature

Magistrate Judge J. Scott Hacker

Printed name and title

ATTACHMENT

On or about April 1, 2019, DEA agents in the McAllen District Office (MDO) agents received information from DEA agents in Laredo, Texas regarding a subject transporting narcotics in the McAllen, Texas area. In addition to the information received from agents in Laredo, DEA agents worked with other federal law enforcement agencies in the McAllen area and through their investigative efforts were able to corroborate information obtained from a source of information. On April 10, 2019, DEA agents established surveillance in the vicinity of 11<sup>th</sup> Street and Savannah Avenue in McAllen, Texas. On April 11, 2019, with the assistance of Pharr Police Department, DEA agents located a white, 2008 Ford F-250 bearing Alabama license plates 2AM4410, registered to Raymond Allen PIERCY. Pharr Police Officer Joshua Ybarra observed a white male subject driving the F-250, later identified as PIERCY, fail to signal to turn at the intersection of 11<sup>th</sup> Street and East Frontage Road in McAllen, Texas.

Shortly thereafter, Officer Ybarra initiated a traffic stop on PIERCY as PIERCY turned in to the Kmart parking lot located at 1801 South 10<sup>th</sup> Street, McAllen, Texas. As Officer Ybarra exited his vehicle to approach PIERCY, PIERCY simultaneously exited the F-250 with his license in hand asking Officer Ybarra what was wrong. Officer Ybarra instructed PIERCY to get back in the vehicle for his safety and PIERCY complied.

While speaking with PIERCY, Officer Ybarra asked PIERCY for consent to search the F-250 and utilize his narcotics K-9 "Logan". PIERCY granted Officer Ybarra consent to search his vehicle. Upon the search, K-9 Logan gave a positive indication for the presence of narcotic odor within the F-250. PIERCY was subsequently detained and the F-250 was transported to the DEA McAllen District Office. K-9 Logan was deployed a second time and alerted the presence of narcotics emitting from a multi-colored bag that was located inside PIERCY's F-250. Upon search of the bag, agents located a folded wooden chess board, with chess pieces, wrapped in clear cellophane.

Agents drilled approximately a 1/8<sup>th</sup> inch hole in to the chess board and extracted a white, powdery substance from inside the boards. A preliminary field test was conducted using a sample of the white, powdery substance which yielded a positive indication for the presence of heroin. The chess board and suspected heroin weighed approximately 7.85 kilograms.

PIERCY was subsequently placed under arrest, Mirandized in his preferred language of English but invoked his Miranda Rights to have a lawyer present.